

EXHIBIT 10

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, MDL NO.
SALES PRACTICES, AND PRODUCTS 16-2738(MAS)(RLS)
LIABILITY LITIGATION

VIDEOCONFERENCE DEPOSITION OF
JOHN GODLESKI, M.D.
Friday, March 29, 2024, 9:15 a.m.
MARRIOTT BOSTON - QUINCY
1000 Marriott Drive
Quincy, Massachusetts 02169

-----REPORTER: Sonya Lopes, RPR, CSR-----

1 for a short time. What this is intended to do is to
2 reduce the number of particles that are close enough
3 to the surface that can easily dissolve, like sodium
4 chloride, which, as I explained earlier, can be
5 found in the tissue as a precipitate. And so if we
6 can reduce those, it saves us time by removing
7 extraneous particle or precipitate that we don't
8 have to study.

9 So we routinely do that washing step before
10 the particles that are -- the blocks that go into
11 the scanning electron microscope.

12 Q. So, generally, what is the reason that you
13 go through all these preliminary steps before you
14 put the block into the scanning electron microscope?

15 A. Well, we know that pathology departments
16 typically and very commonly -- although, more and
17 more, they're starting to use particle-free gloves.
18 But for many years, almost every pathology
19 department just used boxes of 100 gloves that had a
20 lot of particles on them and a lot of talc so that,
21 if you sometimes look carefully at a block or a
22 slide, you can see that contamination around the
23 outside. So we avoid that contamination. We avoid
24 block -- another reason not to choose a block is
25 that it, in fact, shows obvious contamination.

1 These are all parts of the process of doing the
2 studies that we do.

3 MR. DEARING: Thank you, Doctor. That's
4 all I have.

5 MR. HEGARTY: I have just a couple of
6 follow-up questions, Doctor.

7 EXAMINATION

8 BY MR. HEGARTY:

9 Q. With regard to the finding of a
10 birefringent particle in a macrophage, you cannot
11 say that that particle was talc; correct?

12 A. If it's birefringent, it's a birefringent
13 particle.

14 Q. A macrophage would pick up any birefringent
15 particle, regardless of what it is; correct?

16 A. It would pick up all particles that are
17 there when the tissue is inside you.

18 Q. With regard to what you're finding in
19 patients, can a prior C-section introduce talc to
20 the reproductive tract that you're seeing as part of
21 your analysis?

22 A. Generally, surgeons' gloves are particle
23 free and talc free so that in the last 30, 40 years,
24 it would be unlikely that it would. In fact,
25 there's been a dramatic decrease in finding foreign-